

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ACORN REAL PROPERTY	)	
ACQUISITION, INC.,	)	
	)	
Debtor	)	Case No. 22-42718-jmm
	)	
ACORN REAL PROPERTY	)	Chapter 11
ACQUISITION, INC.,	)	
	)	
Plaintiff	)	<b>ANSWER</b>
	)	
vs	)	
	)	
2 BIG LEGACY LLC	)	<b>OF DEFENDANTS</b>
CHRISTOPHER	)	
FLOURNOY	)	
	)	
Defendants.	)	

---

**ANSWER**

Defendants 2 Big Legacy LLC and Christopher Flournoy hereby answer plaintiff Acorn Real Property Acquisition, INC.'s Complaint as follows:

**THE PARTIES**

1. Defendants admit the allegations contained in paragraphs 1 and 2 of the Complaint.
2. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 3, 4, 5 and 6 of the Complaint.
3. Defendants deny the allegations contained in paragraphs 6 through 55 of the Complaint.

**AFFIRMATIVE AND OTHER DEFENSES**

**FIRST DEFENSE**

The complaint fails to state a claim upon which relief may be granted.

**SECOND DEFENSE**

The court lacks personal jurisdiction over defendants.

**THIRD DEFENSE**

The court lacks subject matter jurisdiction over defendants.

**FOURTH DEFENSE**

The complaint is barred by the applicable statute of limitations.

**FIFTH DEFENSE**

The complaint is barred by a prior arbitration and award.

**SIXTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by the doctrine of res judicata.

**SEVENTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by the doctrine of collateral estoppel.

**EIGHTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by the doctrine of estoppel.

**NINTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by the doctrines of waiver and/or release.

**TENTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by the doctrine of laches.

**ELEVENTH DEFENSE**

Plaintiff's claims are barred, in whole or in part, by plaintiff's own culpable conduct.

**TWELVETH DEFENSE**

Plaintiff failed to mitigate its damages, if any.

**THIRTEENTH DEFENSE**

Plaintiff has sustained no damages.

**FOURTEENTH DEFENSE**

If Plaintiff has sustained damages, those damages are incorrectly valued.

**FIFTEENTH DEFENSE**


Defendants reserve the right to assert additional defenses and/or supplement and amend this answer upon the discovery of more definite facts.


**WHEREFORE**, by reason of the foregoing, defendants hereby respectfully request the following relief:

1. Dismissing the complaint with prejudice;
2. Costs of suit; and
3. Such other and further relief as the court deems just and proper.

Respectfully submitted,

2 Big Legacy, LLC

By:   
Christopher Flournoy, Member

  
Christopher Flournoy, Individually